

# **EXHIBIT 185**

# **REDACTED**

**In the Matter Of:**

*In Re - Google Antitrust Litigation*

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*SCOTT SHEFFER*

*July 20, 2021*

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Highly Confidential

Scott Sheffer - July 20, 2021

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4 IN RE:  
5 GOOGLE ANTITRUST LITIGATION  
6 60-516110-0009  
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13 HIGHLY CONFIDENTIAL  
14 REMOTE DEPOSITION OF SCOTT SHEFFER  
15 JULY 20, 2021 - 9:00 A.M.

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25 JOB NO. 2021-803084

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2 features behind how the bids are entered  
3 into the open bidding auction.

4 Q Okay. All right. Let's go  
5 back to your understanding of open  
6 bidding.

7 What are the demand sources  
8 that compete in open bidding?

9 A Well, again, like I am  
10 focused more on the sell side. So from a  
11 demand-side perspective, my knowledge is  
12 going to be necessarily incomplete. But  
13 from a demand perspective, there could be  
14 multiple different DSPs or ad networks  
15 competing into -- into open bidding, for  
16 example.

17 Q So from a publisher  
18 perspective, what does open bidding give a  
19 publisher?

20 A Well, it gives them a source  
21 of ads and monetization.

22 Q How so?

23 A Well, different sources of  
24 demand compete in realtime and then a  
25 winner is determined, and an ad is

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2 delivered to the publisher. And then, you  
3 know, monetization payments are made at  
4 some frequency.

5 Q So let me ask it this way:  
6 What -- what's the difference between open  
7 bidding and an AdX auction?

8 A So, again, I am not familiar  
9 with all the technical details, what  
10 happens in the back end. But my  
11 understanding is that the main difference  
12 between open bidding and Ad Exchange is  
13 that in an open bidding environment, all  
14 the demand sources are competing in a  
15 realtime auction for that particular piece  
16 of inventory, and there are likely to be  
17 more demand sources competing as a result  
18 because of that realtime -- that realtime  
19 aspect.

20 Whereas, Ad Exchange, it's a  
21 realtime bidding environment, but it  
22 conceivably may not have as much -- as  
23 many demand sources as open bidding might  
24 have.

25 Q Okay. That's helpful.

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ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: In Re: Google Antitrust litigation

Dep. Date: July 20, 2021

Deponent: Scott Sheffer

CORRECTIONS:

Page Line	Changes or Corrections and Reasons
21:16	The words “e-mail; so Gmail or calendars, Google Documents” should read “e-mail, so Gmail or calendars, or Google Documents” (Transcription Error)
25:2	The words “access occasionally” should read “occasionally access” (Transcription Error)
35:21	The words “vice president global” should read “vice president of global” (Transcription Error)
38:25	The words “a large publisher of services” should read “large publisher services” (Transcription Error)
40:3	The words “simplicity sake” should read “simplicity’s sake” (Transcription Error)
41:2	The word “distributor” should be removed. (Transcription Error)
42:5	The word “LTS” should read “LPS” (Transcription Error)
46:16	The words “the large partners” should read “large partner solutions” (Transcription Error)
51:24	The name [REDACTED] should read [REDACTED] (Transcription Error)
51:25	The name ‘[REDACTED]’ should read ‘[REDACTED]’ (Transcription Error)
53:13	The word “current” should read “career” (Transcription Error)
59:22	The word “differential” should read “different” (Transcription Error)
62:14	The words “in basis” should read “in some basis” (Transcription Error)
67:17	The words “global partner leads team” should read “global product leads team” (Transcription Error)
89:24-25	The words “internet. There are” should read “internet -- there are” (Transcription Error)

- 91:14 The words “That short term” should read “That’s short for” (Transcription Error)
- 99:8-9 The words “available. And in some cases there’s” should read “available in some cases” (Transcription Error)
- 99:15-16 The words “make their selection,” should be removed (Transcription Error)
- 106:21 The word “serve” should read “server” (Transcription Error)
- 112:23 The words “ad sales” should read “AdSense” (Transcription Error)
- 113:7-8 The words “monetization overall” should read “overall monetization” (Transcription Error)
- 126:5 The word “cal” should read “call” (Transcription Error)
- 129:12 The word “they’re” should read “their” (Transcription Error)
- 138:4 The words “is house ad” should read “is for a house ad” (Transcription Error)
- 140:11 The words “unless utilize” should read “unless you utilize a third-party sales team” (Clarity and Transcription Error)
- 144:11 The word “Travelfusion” should read “Tribal Fusion” (Transcription Error)
- 152:17 The words “not -- ” should be removed (Transcription Error)
- 168:6 The words “starts the matter” should read “starts to matter” (Transcription Error)
- 172:12 The words “potential or” should read “potentially” (Transcription Error)
- 185:19 The words “used -- considered” should be removed (Transcription Error)
- 193: 21 The word “form” should read “forum” (Transcription Error)
- 200:15 The word “bid” should read “been” (Transcription Error)
- 209:23 The word “to” should be removed (Transcription Error)
- 212:15 The word “reskimming” should read “reskinning” (Transcription Error)
- 213:5 The word “an” should read “and” (Transcription Error)
- 214:11 The word “Exchange” should read “Ad Exchange” (Transcription Error)
- 216:5 The words “determinate on their” should read “determined by their” (Transcription Error)
- 218:17-18 The words “Google ad” should read “Google Ads” (Transcription Error)

- 236:5 The words "a unique" should read "unique" (Transcription Error)
- 242:9 The phrase "utilizing -- but, you know, a" should read "utilization of a" (Transcription Error)
- 244:21 The word "out-serving" should read "ad-serving" (Transcription Error)
- 252:4 The word "than" should read "and" (Transcription Error)
- 252:6 The words "bad words demand" should read "AdWords demand" (Transcription Error)
- 256:9 The name [REDACTED] should read [REDACTED] (Transcription Error)
- 262:7 The word "their" should read "there" (Transcription Error)
- 267:3 The words "and call lead" should be removed (Transcription Error)
- 267:4 The word "stopped" should read "stop" (Transcription Error)
- 277:3 The words "coming to hand" should read "coming to mind" (Transcription Error)
- 290:7 The words "what our" should read "whatever" (Transcription Error)
- 291:12-13 The word "mean it to that" should read "mean it to mean that" (Transcription Error)
- 309:12 The word "A10ps" should read "ads" (Transcription Error)
- 315:11-12 The question "Is there an AdMob developer called other demand sources?" should read "Can an AdMob developer call other demand sources?" (Transcription Error)
- 332:9 The words "that's example" should read "that's an example" (Transcription Error)

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefor.

Date: 8/11/2021

Signature: 